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January 22, 2020
Project # 2020-20156

Mr. Ken Kovalchuk
Kova Enterprises LLC
421 Lake View Boulevard
Sandpoint, Idaho 83864
E: fsg2000@msn.com
P: 412-759-9194

RE: Limited Environmental Site Evaluation
Former Railroad Property
Bonner County Parcel RPD00000309900A
Dover, Idaho

Mr. Kovalchuk,

191 North, LLC (191 North) is pleased to provide this Limited Environmental Site Evaluation (LESE) for the above referenced Site. This project was performed in accordance with our proposal dated November 30, 2020, as authorized on November 30, 2020.

BACKGROUND

A Phase I Environmental Site Assessment was completed in November 27, 2020 by 191 North, LLC for the above referenced Site. The Phase I ESA identified RECs at the Site and recommended further investigation surrounding the stockpiled soils for the former railroad.

SCOPE OF SERVICES

In general accordance with our proposal, 191 North contacted the public utility locating service for utility line locating on the Site. Additionally, a drilling subcontractor with a Geoprobe direct push drill rig was utilized to advance eleven (11) borings at approximately 250-foot intervals along the former railroad to collect soil samples from the subsurface soils. Our field services were conducted on December 14, 2020 by Mr. Seth Brundige, an environmental professional with 191 North.

STANDARD OF CARE

191 North’s services were performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time period. 191 North makes no warranties, either express or implied, regarding the findings, conclusions or recommendations. Please note that 191 North does not warrant the work of laboratories, regulatory agencies or other third parties supplying information used in the preparation of the report. These LESE services were performed in accordance with the scope of services agreed with you, our client, as reflected in our proposal and were not restricted by ASTM E1903-11.

ADDITIONAL SCOPE LIMITATIONS

Findings, conclusions and recommendations resulting from these services are based upon information derived from the on-site activities and other services performed under this scope of services; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, non-detectable or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this LESE. Subsurface conditions may vary from those encountered at specific subsurface exploration locations or during other surveys, tests, assessments, evaluations or exploratory services; the data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

RELIANCE

This report has been prepared for the exclusive use and reliance of Kova Enterprises LLC. Any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the site) is prohibited without the express written authorization of the client and 191 North. Any unauthorized distribution or reuse is at the client’s sole risk. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions and limitations stated in the proposal and LESE report. The limitation of liability defined in the terms and conditions is the aggregate limit of 191 North’s liability to the client and all relying parties unless otherwise agreed in writing.

FIELD ACTIVITIES

SAMPLING PROGRAM AND LABORATORY ANALYSIS

The fill soils encountered varied from silt and sand to gravel with sand and silt. The native soils encountered were described as silt to clay. Soils were typically brown to gray in color and did not produce visible “rainbow” sheen when placed in water bath. Indicators of petroleum impact were not observed during the field screening process. Soil samples were collected using four-foot Geoprobe core barrel single-use sleeve samplers. Samples

for analysis were selected from the upper 18 to 24 inches in the fill soil, and from apparent native silt/clay soil just below the native/fill soil interface. The borings were backfilled with bentonite chips. Groundwater was not encountered/observed in the borings. The approximate boring locations are illustrated on Figure 2 in Appendix A.

191 North collected samples for analysis from each of the eleven (11) boring locations. Seventen (17) soil samples were collected placed in laboratory prepared containers, labeled, and placed on ice in a cooler. The samples and completed chain-of-custody forms were submitted to Environmental Sciences Corporation, an Idaho State certified laboratory for the selected analytical analysis for a standard turnaround time by the following methods.

Analysis	Sample Type	No. of Samples	Laboratory Method
Select Polycyclic Aromatic Hydrocarbons (PAHs)	Soil	18	8270SIM
Lead, Arsenic	Soil	18	6010B (ICP)

The executed chain-of-custody forms and laboratory data analytical reports are provided in Appendix C.

DATA EVALUATION

Based on the laboratory analysis, PAHs, lead, and arsenic were detected at concentrations above the applicable laboratory method detection limits, but below the Environmental Protection Agency (EPA) and Idaho Department of Environmental Quality (DEQ) residential screening levels, with the exception of arsenic which is discussed below. Unrestricted land/residential use screening levels established by the EPA (lead and arsenic) and DEQ (select PAHs) residential screening levels were used.

The soil samples obtained were analyzed for the polycyclic aromatic hydrocarbon compounds Acenaphthene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Fluoranthene, Fluorene, and Pyrene. The results were compared to the IDEQ Screening Level Concentrations for Soil (bold values in Table 2, Risk Evaluation Manual for Petroleum Releases – August 2018). The detected concentrations are shown in the following table (Table 1).

SUMMARY OF FINDINGS, OPINIONS AND RECOMMENDATIONS

The objective of the LESE was to evaluate the presence/absence of select polycyclic aromatic hydrocarbons, lead and arsenic in the on-site soils along the former railroad. The following summary of findings along with opinions and recommendations are provided:

- The laboratory analysis/results of soils analyzed were non-detect or below the values set for residential screening levels as set forth by the Idaho DEQ and EPA for Acenaphthene, Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Chrysene, Fluoranthene, Fluorene, Pyrene, and Lead. Arsenic was identified present at concentrations above the EPA screening level for residential development.
- Arsenic was detected at concentrations above the applicable laboratory method detection limits, and above the EPA residential screening levels for unrestricted land use. Idaho Department of Environmental Quality does not have a specified screening level for arsenic, to which, the fall back is the EPA. However, in a document titled “Natural Background Soil Metals Concentrations in Washington State” published by the Washington Department of Ecology in October 1994, the background levels of arsenic in the Spokane Basin ranged in values from 1.13 mg/kg to 10.33 mg/kg, and East Washington ranged in values from 0.5 mg/kg to 28.6 mg/kg. Priest River is approximately 19.5 miles east of Washington and the regional values discussed in the report may be interpreted to extend beyond the state line. Another document, “Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States” published by the USGS in 1984, shows analysis of soils taken in north Idaho to range from 10 mg/kg to 26 mg/kg. Residential use screening level in Washington is 20 mg/kg (Washington Department of Ecology) and 40 mg/kg in Montana (Montana Department of Environmental Quality). Arsenic concentrations detected would then lie within natural background levels and also within adjoining states screening levels that do not fall back on the EPA level. Remediation of soils is recommended by the Idaho Department of Environmental Quality and the Panhandle Health District Institutional Controls Program for the Basin Remediation Program in the Silver Valley (Kellogg area) of Idaho if soils exceed 100.0 mg/kg. Additional Site evaluation regarding arsenic does not appear warranted at this time.

Based on the analytical results from the soil samples collected, additional site characterization/testing does not appear warranted at this time.

We appreciate the opportunity to present this letter report and assist with this project. If you have any questions, or if you need additional information, please contact us at (208) 391-6923.

Sincerely,

191 North, LLC



Seth A. Brundige, P.G. (Idaho and Washington)



APPENDIX A

Figure 1- Site Vicinity

Figure 2 – Boring Location Diagram



APPENDIX B

Laboratory Results
Chain of Custody

